

1 Belinda Escobosa Helzer (pro hac vice)
2 Adrian Hernandez (pro hac vice)
3 Ernest Herrera (pro hac vice)
4 MEXICAN AMERICAN LEGAL DEFENSE
5 AND EDUCATIONAL FUND
6 634 S. Spring St., 11th Floor
7 Los Angeles, CA 90014
8 Telephone: (213) 629-2512
9 Facsimile: (213) 629-0266
10 bescobosa@maldef.org
11 ahernandez@maldef.org
e herrera@maldef.org

12 F. Travis Buchanan, Esq.
13 NV Bar No. 9371
14 The Cochran Firm – Las Vegas
15 701 E. Bridger, Suite 540
16 Las Vegas, NV 89101
17 Telephone: (702) 331-5478
18 Facsimile: (702) 629-6919
19 FtbLaw@gmail.com

20 *Attorneys for Plaintiffs*

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22 UNITED STATES DISTRICT COURT

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24 DISTRICT OF NEVADA

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26 ALICIA INES MOYA GARAY, JUAN
27 JAIME LOPEZ-JIMENEZ, and
28 ARIBA LAS VEGAS WORKER
CENTER,

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Plaintiffs,

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vs.

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32 CITY OF LAS VEGAS, a municipality;
33 MICHELE FREEMAN, in her official
34 capacity as City of Las Vegas Chief of
35 Department of Public Safety;
36 BANANTO SMITH, in his individual
37 capacity and official capacity as Deputy
38 Chief of Detention Services;

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Defendants.

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43 Case No. 2:20-cv-00119-GMN-EJY

44 STIPULATION AND ~~PROPOSED~~ ORDER
45 TO EXTEND DISCOVERY DEADLINES

46 (THIRD REQUEST)

1 **STIPULATION AND [PROPOSED] ORDER TO EXTEND DISCOVERY DEADLINES**

2 Pursuant to LR IA 6-1 and LR 26-3, the parties, by and through their respective counsel of
 3 record, hereby stipulate and request that this Court extend the Discovery Deadlines in the above-
 4 captioned case. Plaintiffs Alicia Ines Moya Garay and Juan Jaime Lopez-Jimenez (“Plaintiffs”)
 5 and Defendants City of Las Vegas, *et al.* (“Defendants”) stipulate and respectfully request a sixty
 6 (60) day extension of the current scheduling order deadlines. In support of this Stipulation and
 7 Request, the parties state as follows:

8 **A. DISCOVERY COMPLETED TO DATE**

9 Plaintiffs Alicia Ines Moya Garay and Juan Jaime Lopez-Jimenez (“Plaintiffs”) and
 10 Defendants City of Las Vegas, *et al.* (“Defendants”) made their initial disclosures on June 16, 2020.
 11 Plaintiffs propounded their First Set of Interrogatories on August 5, 2020. On August 31, 2020,
 12 Defendants requested an extension to respond to Plaintiffs’ First Set of Interrogatories, which
 13 Plaintiffs granted. On September 2, 2020 Plaintiffs served their First Set of Requests for Admission
 14 and Requests for Production of Documents. On September 10, 2020, Defendants served their
 15 responses to Plaintiffs’ First Set of Interrogatories. On September 24, 2020, Plaintiffs served their
 16 amended First Set of Interrogatories. On October 1, 2020, Defendants served their responses to
 17 Plaintiffs’ First Set of Requests for Admission. On October 15, 2020, Defendants served their
 18 responses to Plaintiffs’ First Set of Requests for Production of Documents. On October 20, 2020,
 19 Defendants served their responses to Plaintiffs’ amended First Set of Interrogatories. On November
 20 5, 2020, Defendants served their First Supplemental Responses to Plaintiffs’ First Set of Requests
 21 for Production of Documents. On December 18, 2020, Defendants served their Supplemental
 22 Responses to Plaintiffs’ First Set of Requests for Admission. On December 21, 2020, December
 23 22, 2020, and December 29, 2020, Plaintiffs conducted the depositions of three witnesses employed
 24 by the City of Las Vegas. On January, 21, 2021, Defendants served their First Set of Interrogatories
 25 and First Set of Requests for Production of Documents.

26 **B. DISCOVERY REMAINING TO BE COMPLETED**

1 The parties in this case continue to propound and respond to written discovery and must
 2 conduct additional depositions, in addition to making their expert disclosures.

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4 **C. REASON FOR REQUEST FOR EXTENSION OF DISCOVERY DEADLINES**

5 Plaintiffs continue to coordinate with an expert to provide forensic psychological services.
 6 In light of the logistical challenges that have arisen because the COVID-19 pandemic, including
 7 securing video conferencing/telemedicine technology for Plaintiffs, Plaintiffs require more time to
 8 provide merits experts' disclosures. Because Plaintiffs have exhibited diligence in their search for
 9 an expert witness and because Defendants do not oppose the request, Plaintiffs demonstrate good
 10 and just cause for the extension.

11 Further, the parties have exhibited diligence in propounding and responding to written
 12 discovery and conducting depositions, but significant discovery remains to be completed. For
 13 example, Plaintiffs have conducted three depositions of Defendants' witnesses and are preparing
 14 to notice additional depositions. Defendants must also conduct Plaintiffs' depositions. The parties
 15 also anticipate likely expert depositions. Moreover, based on the number of witnesses identified in
 16 Defendants' initial disclosures and discovery responses, the parties have discussed the possibility
 17 of seeking leave of court under Fed. R. Civ. P 30(a)(2)(A)(i) to take more than ten (10) depositions.
 18 The parties respectfully request an extension of the discovery cut-off date, in the event that the
 19 parties stipulate to taking more than ten depositions at a later time.

20 Because of Plaintiffs' diligence and because Defendants do not oppose the request, the
 21 parties demonstrate good and just cause for the extension. The parties respectfully request a sixty
 22 (60) day extension of the current scheduling order deadlines in accordance with the proposed
 23 scheduling order below.

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25 **D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY**

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|---|-------------------|
| 26 1. Initial Disclosures | June 16, 2020 |
| 27 2. Amending pleadings / adding parties | December 28, 2020 |

1	3. Merits experts' disclosures due	March 30, 2021
2	4. Rebuttal experts' disclosures due	April 30, 2021
3	5. Discovery Cut-off date	May 25, 2021
4	6. Dispositive Motions due	June 25, 2021

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7 Dated: January 29, 2021

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9 MEXICAN AMERICAN LEGAL DEFENSE
AND EDUCATIONAL FUND

10 By: /s/ Adrian Hernandez
11 Belinda Escobosa Helzer
Adrian Hernandez
12 Ernest Herrera
MEXICAN AMERICAN LEGAL DEFENSE
13 AND EDUCATIONAL FUND
634 S. Spring St., 11th floor
14 Los Angeles, CA 90014
Telephone: (213) 629-2512
15 Facsimile: (213) 629-0266

16 F. Travis Buchanan, Esq.
NV Bar No. 9371
17 The Cochran Firm – Las Vegas
701 E. Bridger, Suite 540
18 Las Vegas, NV 89101
Telephone: (702) 331-5478
19 Facsimile: (702) 629-6919
FtbLaw@gmail.com

20 *Attorneys for Plaintiffs*

BRYAN SCOTT
City Attorney

By: /s/ Seth T. Floyd
Deputy City Attorney
Nevada Bar No. 11959
Philip R. Byrnes
Senior Litigation Counsel
Nevada Bar No. 166
495 South Main Street, Sixth Floor
Las Vegas, NV 89101

Attorneys for Defendants

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24 IT IS SO ORDERED; provided, however, that
the joint pretrial order is due July 26, 2021
unless discovery motions are filed and remain
pending at that time. If dispositive motions
remain pending on July 26, 2021, the joint
pretrial order shall be due 60 days after an
order or orders are issued on such motions.

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27 IT IS FURTHER ORDERED that no
additional extensions of the Scheduling Order
will be granted absent demonstration of
extraordinary circumstance.

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UNITED STATES MAGISTRATE JUDGE

DATED: January 29, 2021